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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JANE DOE, individually and on behalf of all
other similarly situated,

Plaintiff,

v.

GOODRX HOLDINGS, INC., CRITEO
CORP., META PLATFORMS, INC., AND
GOOGLE LLC.,

Defendants.

Case No. 3:23-cv-00501-LB

**STIPULATION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S COMPLAINT**

Action Filed: February 2, 2023

Honorable Laurel Beeler

1 Pursuant to Civil Local Rule 6-1(a), Plaintiff Jane Doe (“Plaintiff”) and Defendants Meta
2 Platforms, Inc. (“Meta”), Criteo Corp. (“Criteo”), and Google LLC (“Google”), by and through their
3 respective counsel of record, hereby stipulate as follows:

4 WHEREAS, Plaintiff filed this action on February 2, 2023;

5 WHEREAS, Meta was served with the Complaint on February 6, 2023;

6 WHEREAS, Criteo was served with the Complaint on February 6, 2023;

7 WHEREAS, Google was served with the Complaint on February 6, 2023;

8 WHEREAS, Meta, Criteo, and Google’s deadlines to respond to the Complaint are all currently
9 set for February 27, 2023;

10 WHEREAS, counsel for Meta, Criteo, and Google and counsel for Plaintiff have conferred
11 regarding this stipulation;

12 WHEREAS, the parties have agreed to extend Meta, Criteo, and Google’s deadlines to respond
13 to the Complaint by 45 days to April 13, 2023;

14 WHEREAS, the parties further agree that if Meta, Criteo, and/or Google file motions to dismiss
15 the Complaint, Plaintiff shall have until May 30, 2023 to file her papers in opposition to the motions
16 to dismiss the Complaint;

17 WHEREAS, the parties further agree that Meta, Criteo, and Google shall have until June 23,
18 2023 to file their replies to Plaintiff’s opposition;

19 WHEREAS, the proposed stipulated extensions will not alter the date of any event or deadline
20 already fixed by Court order;

21 WHEREAS, this stipulation is without prejudice to any defense Meta, Criteo, or Google
22 might assert in this action;

23 NOW, THEREFORE, the parties hereby stipulate and agree that Defendants Meta, Criteo,
24 and Google’s deadlines to respond to the Complaint shall be extended by 45 days to April 13, 2023,
25 Plaintiff’s deadline to oppose any motions to dismiss filed by Defendants Meta, Criteo, and Google
26 shall be extended by 46 days to May 30, 2023, and Defendants Meta, Criteo, and Google’s deadlines
27 to reply to Plaintiff’s opposition shall be extended to June 23, 2023.

28 IT IS SO STIPULATED.

Dated: February 27, 2023

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Darcy C. Harris
Darcy C. Harris

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CIVIL L.R. 5-1(h)(3) ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I, Darcy C. Harris, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: February 27, 2023

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Darcy C. Harris
Darcy C. Harris